

**3:18mj0310**United States Courts  
Southern District of Texas  
FILED

May 18, 2018

David J. Bradley, Clerk of Court

**Northern District of Texas****CRIMINAL COMPLAINT****4:18mj0820**

*Beginning on or before January 18, 2018 and continuing through on or after February 09, 2018, in the Dallas Division of the Northern District of Texas and elsewhere, **QUINTON SHELTON** and others known and unknown knowingly, intentionally, and unlawfully conspired together and with each other, to commit certain offenses against the United States, to-wit: interference with commerce by robbery, in violation of Title 18, U.S.C. § 1951(a).*

I, Christopher B. Doering, a Special Agent with the Federal Bureau of Investigation ("FBI"), being duly sworn, depose and state as follows:

### INTRODUCTION

1. I have been a Special Agent with the FBI for more than 12 years. I have been a Special Agent with the FBI Violent Crimes Task Force ("DVCTF") since July of 2016. As part of the DVCTF, I investigate several federal crimes, including bank robberies, commercial robberies, extortions, and kidnappings. This affidavit is based on my personal knowledge as well as on information provided to me by other law enforcement officers and other individuals who have participated in this investigation. Since this affidavit is being submitted for the limited purpose of establishing probable cause for an arrest warrant via criminal complaint, I have not included each and every fact known to me concerning this investigation.

### OVERVIEW

5. Investigators from the FBI and Dallas Police Department ("DPD") are investigating a series of offenses known as ATM technician robberies ("ATM robberies"), which in this particular case has involved the organized surveillance and

robbery of victims who are robbed of cash used or intended for use in the operation of businesses engaged in interstate commerce.

6. ATM robberies involve a group taking money from an ATM while an ATM technician performs maintenance on it. These groups are known to identify ATM technicians and surveil them—in some cases even from the homes of ATM technicians—to an ATM. Once the technician begins work on the ATM, the group waits until the ATM cash is unsecured. At this point, the group acts by taking the cash from the ATM either through force or the threat of force. Investigators have identified numerous offenses conducted by several different groups throughout the United States, to include the numerous cities in Texas to include locations in the Northern District of Texas.

7. In reference to the ATM robberies, the banks typically hire a vendor business to service their ATMs. When an ATM robbery occurs, the nature of the business agreement between the bank and the vendor that services the ATM dictates which entity—the bank or the vendor—has care, custody, and control of the monies in the ATM and which bears the risk of loss. When an FDIC-insured bank has care, custody, and control of the money or bears the risk of loss, the bank robbery statute may apply when the money is taken through force and violence or by means of intimidation. *See* 18 U.S.C. § 2113(a). The Hobbs Act statute may also apply when the vendor operates in interstate commerce and the robbery has an effect on commerce. *See* 18 U.S.C. § 1951. This is so because investigators have determined that the ATM service companies are often engaged in interstate commerce, and the ATMs are instrumentalities of interstate commerce.

8. The investigation has shown that Quinton Shelton (a/k/a "Debo"), Johnny Clark ("Clark"), and others known and unknown are from Houston, Texas, and investigators believe they travel to other places to conduct ATM robberies.

9. Shelton and others are members of a group that call themselves "HCMT," or "Hiram Clark Money Team." Investigators believe this group engages in ATM robberies and other robbery or theft activities in numerous locations in California and Texas.

#### INSTANT INVESTIGATION

10. The investigation to date has used motel records, Instagram records from both a search warrant and those pages available for public viewing, the review of business records some of which were obtained by subpoena, the review of cellular phone data pursuant to a search warrant or court order, and vehicle GPS records produced through the ordinary course of business to link Shelton's group to the listed offenses below.

11. An ATM robbery occurred at approximately 11:22 a.m.<sup>1</sup> on February 9, 2018, at Chase Bank, located at 1000 W. Centerville Road, Garland, Texas in the Northern District of Texas. The suspects were identified as black males, and the suspect vehicle was a white Mercedes sports utility vehicle ("SUV"). The ATM technician was punched in the face, and approximately \$71,000 of U.S. currency was stolen. Video surveillance depicts a white Mercedes SUV as the suspect vehicle. *PH 2*

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<sup>1</sup> According to time stamp from bank's video surveillance.



12. In a separate incident, Johnny Clark was arrested by HPD on February 13, 2018 while driving a leased white Mercedes SUV.<sup>2</sup> Clark was arrested for engaging in organized criminal activity for conduct related to a robbery offense. The white Mercedes SUV was leased to a female with whom Clark has an off again/on again relationship. Investigators learned that the leasing company used a GPS device in the ordinary course of business and that this device registered the vehicle's location approximately every six hours. Investigators obtained the GPS data for the white Mercedes SUV, and it revealed that the vehicle was in or very near the parking lot of the Stay Express Inn motel in Dallas on both February 8 and 9, 2018. Records from the Stay Express Inn revealed Shelton and another person known to the investigation paid cash for two rooms on February 8, 2018 with a checkout date the following day.

13. A review of Shelton's Instagram page revealed he sent an Instagram message at approximately 11:38 p.m. on February 8, 2018, the night before the robbery. The message stated, "No I'm in dallas I'm chillin, I know u got thousands of niggas in these dms this time of night so send me the number."

14. A preliminary review of cellular data for Shelton's cellular phone revealed that his phone called an individual, who is known to this investigation and believed to be involved in this offense, at approximately 11:20 a.m. on February 9, 2018, for a duration of approximately 199 seconds. Shelton's cellular phone used a cell tower with a coverage

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<sup>2</sup> On April 25, 2018, while on general surveillance for robbery or theft activity, Houston Police Department officers observed the white Mercedes SUV, which they knew to be associated with jugging activity, and began surveillance on that vehicle. HPD subsequently arrested Clark that day for a jugging offense while he was using the white Mercedes SUV.

area of the offense location. After this call, the cellular data points suggested travelling out of Dallas to Houston.

15. A review of Shelton's Instagram page revealed a photograph taken on February 9, 2018, at 12:11 p.m. The photograph depicted Shelton, Clark, and an unknown individual in what appears to be an SUV with a white interior. The unknown individual is in the back seat and holding what appears to be a large black bag. There is an "hcm1" caption on the photograph. *In my experience, I have seen members of robbery crews post a "victory pic" on social media after an offense.*


16. The FBI was informed that NCR Corporation ("NCR"), the business contracted by the bank for servicing the ATM involved in the February 9, 2018 robbery, was responsible for the loss.

17. There is probable cause to believe that the robbery of the ATMs interfered with interstate and/or foreign commerce as required by 18 U.S.C. § 1951(a). An interview with an NCR Manager revealed that NCR is currently headquartered in Atlanta, Georgia. NCR manufactures ATMs that are sold to financial institutions. The ATMs are manufactured in Beijing, China; Duluth, Georgia; and Waterloo, Canada. The ATMs are shipped to a location for the purchasing bank. Once the ATM arrives to the financial institution for installation, NCR sends a representative to oversee the installation by a third party "rigger." NCR also services the ATMs. The servicing can be for warranted repair or repairs not covered under warranty. The requests for repair go through NCR headquarters and a work order is then sent to the NCR territory where the affected ATM is located. If the repair is unwarranted, NCR will collect the bank payment through its headquarters. The ATM parts go to a distribution warehouse in Memphis, Tennessee

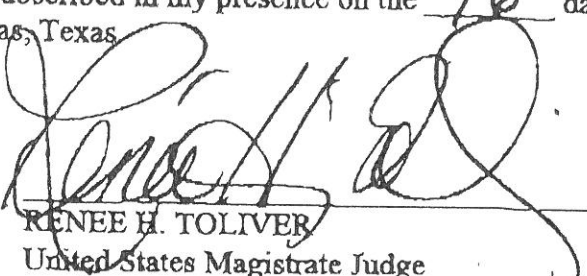
before they are shipped to an NCR territory for storage or use. For both Chase and Bank of America, when the ATM is used by a customer, the information is sent across the internet for authentication by company servers located outside the state of Texas. Due to the recent increase in ATM robberies, NCR has suffered monetary losses and forced to hire additional armed guards increasing the cost to service ATMs. The losses and increased costs would have been used to purchase additional inventory, and for other business expenses.

18. Based upon the foregoing facts and information, I submit there is probable cause to believe that Shelton and others known and unknown conspired to interfere with interstate commerce by robbery, in violation of 18 U.S.C. § 1951(a).

Date

05/17/2018  
CHRISTOPHER B. DOERING  
Special Agent, FBI

Sworn to before me and subscribed in my presence on the 16<sup>th</sup> day of May 2018, at 12:02 p.m. at Dallas, Texas

  
RENEE H. TOLIVER  
United States Magistrate Judge  
Northern District of Texas



**SEALED**

AO 442 (Rev. 11/11) Arrest Warrant

**UNITED STATES DISTRICT COURT**

for the

Northern District of Texas

United States of America

v.

QUINTON SHELTON  
also known as "Debo"

Case No.

3:18-mj-310 BK

Defendant**ARREST WARRANT**

To: Any authorized law enforcement officer

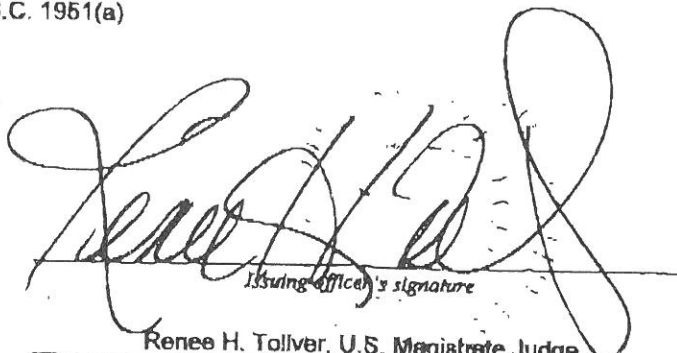
**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
(name of person to be arrested) Quinton Shelton  
who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment    ☐ Superseding Indictment    ☐ Information    ☐ Superseding Information    ☒ Complaint  
☐ Probation Violation Petition    ☐ Supervised Release Violation Petition    ☐ Violation Notice    ☐ Order of the Court

This offense is briefly described as follows:

Conspiracy to Interfere with Commerce by Robbery, 18 U.S.C. 1951(a)

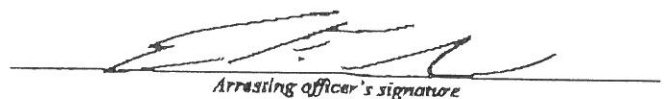
Date: 5/16/2018City and state: Dallas, Texas

  
Issuing officer's signature  
Renee H. Tolliver, U.S. Magistrate Judge  
Printed name and title

**Return**

This warrant was received on (date) 5/17/18, and the person was arrested on (date) 5/17/18  
at (city and state) Houston, TX

Date: 5/17/18

  
Arresting officer's signature  
Edward Grant, Special Agent  
Printed name and title